

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

JASON A. RICHER,
Plaintiff

v.
JASON PARMELEE as the Finance Director of
THE TOWN OF NORTH SMITHFIELD,
TOWN OF NORTH SMITHFIELD, and
STEVEN E. REYNOLDS in his official
capacity as Chief of the NORTH SMITHFIELD
POLICE DEPARTMENT
Defendants

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C.A. No. 15-162

PLAINTIFF'S MOTION TO EXTEND THE DISCOVERY DEADLINES

Plaintiff Jason Richer hereby moves to extend the discovery deadlines by six months on the grounds that discovery was stayed during almost the entire period provided for fact discovery under the existing scheduling order.

Here, the only discovery that has occurred is one set of requests for admission that Plaintiff served on Defendants and to which Defendants responded on October 13, 2015. Although Plaintiff filed suit on April 23, 2015, discovery was essentially stayed while Magistrate Judge Sullivan attempted to settle the case. On December 21, 2015, the Court noticed a scheduling conference for January 7, 2016. Plaintiff served interrogatories and a document request on Defendants on December 23, 2015. On January 7, 2016, the Court held a scheduling conference and entered the scheduling order setting the close of fact discovery for June 30, 2016. However, the Court stayed discovery on January 29, 2016 pending its decision on Plaintiff's Motion for Partial Summary Judgment. The Court issued that Decision on June 1st. On June 13th, Plaintiff requested that Defendants respond to the outstanding discovery but they have not done so. Plaintiff has never received responses to that discovery nor has there been any other

discovery other than the requests for admission. Essentially, there has been almost no discovery in this case.

Accordingly, Plaintiff requests that the Court enter a new scheduling order with the following deadlines:

All factual discovery will be closed by December 31, 2016

All expert discovery will be closed by April 1, 2017

Plaintiff shall make his expert witness disclosures as required by F.R.Civ.P. 26(a)(2) by January 31, 2017

Defendants shall make their expert witness disclosures as required by F.R.Civ.P. 26(a)(2) by March 2, 2017

Respectfully submitted,
JASON RICHER
By his attorneys,

/s/ Thomas W. Lyons
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CERTIFICATION

I hereby certify that on August 2, 2016 a copy of the foregoing was filed and served electronically on all registered CM/ECF users through the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Thomas W. Lyons